



September 15, 2021

Docket Management Facility
US Department of Transportation
1200 New Jersey Avenue
SE West Building Ground Floor Room W12-140
Washington, DC 20590

Subject: *Request for Amendment/Extension to Exemption No. 13184B, Regulatory Docket No. FAA-2015-3743, Exemption from 14 CFR §91.9(a).*

Filed electronically using the Federal Document Management System, <http://regulations.gov>, on this date.

Note: Era Helicopters LLC is now operating under a DBA (doing business as) "Bristow VTOL" and will be referred to as such in this petition. Era Helicopters LLC and Bristow U.S. LLC have merged organizations however still operate two separate independent air operating certificates until further notice.

Dear Sir or Madam,

In accordance with Title 14 of the Code of Federal Regulations 11.15 and 11.81, Bristow VTOL requests an exemption from § 91.9(a) which states:

Except as provided in paragraph (d) of this section, no person may operate a civil aircraft without complying with the operating limitations specified in the approved Rotorcraft Flight Manual, markings, and placards, or as otherwise prescribed by the certifying authority of the country of registry.

Extent of Relief Sought and Reason for the Relief

This petition requests an exemption from the following S92A Rotorcraft Flight Manual limitation when operating between land-based and offshore facilities, or when operating between two offshore facilities.

Types of Operation

Category A with a maximum of 19 passenger seats, or Category B with 9 or less passenger seats; Day, Night, VFR and IFR.

Specifically, Bristow VTOL requests an amendment and extension to: *operate S92A helicopters with limited exposure to engine failure during takeoff and landing while carrying up to 19 passengers.*



This Exemption is in the Public Interest

The S92A is certified to the latest standards (§29 amendment 47), and equipped with state-of-the-art safety systems and technology, and is routinely used to transport workers to and from offshore platforms in support of the oil and gas industry. The installed equipment (to include HUMS, FDM, HTAWS, ADS-B, TCAS-, Fault Tolerant Design, in addition to other advanced avionics and electronics) allow this rotorcraft to offer the highest level of safety available today.

These aircraft have replaced older designs, which did not offer these advancements, and are not required to meet the current performance requirements imposed on the S92A. The intent of this exemption is to provide those workers, our passengers, with the safest transportation available, while maintaining an efficient transportation system for the oil and gas industry. For these reasons, this exemption is in the general public interest.

Equivalent Level of Safety

The S92A has operated under Operations Specification H100 in the United States, and under JAR-OPS 3 in other countries, since 2003. Both rules allow for limited exposure to engine failure. The requested exemption will continue to provide the same level of safety that is currently in place for offshore operations. During the period noted above, no accidents in the S92A are attributed to power loss due to engine failure during takeoff or landing.

If this exemption is granted, the S92A will continue to operate Category A, with the exception of a brief exposure to engine failure during takeoff and landing. The S92A aircraft performance charts listed below can provide the necessary data to show an equivalent level of safety.

For aircraft certified up to 26,500lbs, procedures are outlined in the S92A Rotorcraft Flight Manual, Part 2, Section III, Supplemental Performance Data, Revision 7, "Elevated Helideck Takeoff and Landing Limited Exposure" – (At Figure 3-22 WAT), (pages III-1-50 through III-1-55).

For aircraft certified to 27,700lbs procedures are outlined in the S92A Rotorcraft Flight Manual Part 2, Section III, Supplemental Performance Data, "Elevated Helideck Takeoff and Landing" Supplement 14, Part 2, Revision No. 1, (pages 3-47 through 3-54).

Should this exemption be denied, the S92A would be forced to severely decrease the number of passengers and/or fuel per flight. Decreased passenger loads will require more flights to meet demand and effectively increase exposure to hazards unrelated to engine failure.



Operations Outside of the United States

S92A operators outside of the United States do not require this exemption. JAR-OPS 3 and other equivalent operational rules already permit operations with limited exposure to engine failure.

Bristow VTOL wishes to have this exemption apply to their operations outside the U.S. for the same reasons stated herein.

Mitigation Factors

In the unlikely case of a ditching as a result of an engine failure during takeoff or landing, the following mitigations are provided:

- The S92A is equipped with aircraft flotation gear and is certified for ditching in up to sea state 4, at a minimum, and sea state 6 when additional equipment is installed and operational.
- When operating over water, each S92A occupant is provided, and wears, personal flotation equipment.
- The S92A is equipped with life rafts that can be deployed from inside or outside the aircraft.
- Bristow S92As are equipped with a 406 MHZ deployable beacon.

To qualify for JAR-OPS 3 Performance Class 2 operations (limited exposure to engine failure), Sikorsky Aircraft periodically submits engine reliability reports to show that the in-flight shutdown rate is less than 1 per 100,000 flight hours.

Bristow VTOL will conduct operations in such a manner as to minimize the time spent exposed to engine failure. This will be accomplished by following the manufacturer's recommended takeoff and landing procedures whenever feasible. Operations will not be conducted unless the current aircraft weight, altitude, and temperature ensure a 150 feet per minute climb at 1,000 feet above the takeoff surface with one engine inoperative and the remaining engine at maximum continuous OEI power.

Bristow VTOL further mitigates exposure risk by:

- Conducting flight operations to and from heliports and landing areas that meet or exceed the size and weight requirements appropriate to the aircraft configuration;
- Training our flight crews in a Level D, FFS (full flight simulator), and ensuring the highest levels of proficiency and competency;
- Conducting route checks to confirm that Bristow flight crews remain procedurally compliant and employ crew resource management principles during all flight operations; and



- Ensuring flight profiles are in accordance with Performance Class 2 procedures, as described in the Bristow's Operations Manual Part A, General Procedures (which includes flight procedures), through flight data monitoring.

Summary

To date, the S92A has surpassed 1,000,000 flight hours of operational experience, all in accordance with H100 and Performance Class 2 profiles. This experience demonstrates that when takeoff and landing techniques are used to minimize exposure to forced landing due to engine failure, this aircraft can be operated at an equivalent level of safety to Category A (PC-1).

Due to the remote nature of our operations, helideck size and off-airport basing, the viability of full Category A or Performance Class One (PC1) is impractical. If this requirement were to be imposed, the S92A would become economically unfeasible and would likely result in its removal from service. The outcome of which would be a reversion to smaller, older, and less sophisticated aircraft that do not provide the same level of safety. This would result in an overall degradation of safety and is not in the best interest of our most important stakeholder - our passengers.

If there are any questions concerning this petition, or to report the disposition of this request, please contact me as indicated below.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jason Glynn", is written over a horizontal line.

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